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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THERESA STONE, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

Case No. 2:24-CV-00195-GMN-EJY

**STIPULATION TO EXTEND TIME
FOR DEFENDANT EQUIFAX
INFORMATION SERVICES LLC TO
FILE RESPONSE TO PLAINTIFF'S
OBJECTIONS TO MAGISTRATE
JUDGE'S RULING AND FOR
PLAINTIFF TO MOVE FOR LEAVE
TO FILE REPLY
(Third Request)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Defendant Equifax Information Services LLC ("Equifax"), through its undersigned counsel, and Plaintiff Theresa Stone, through her undersigned counsel, hereby stipulate and agree, subject to the Court's approval, to extend the deadline for Equifax to file its response to Plaintiff's Objections to Magistrate Judge's Ruling, Dkt. 41 ("Objections"), and to extend the deadline for Plaintiff for move for leave to submit a reply by two weeks, as follows:

1 1. On August 29, 2024, the Magistrate Judge entered an Order granting Equifax's
2 motion to stay discovery pending a ruling on Equifax's motion to dismiss. Dkt. 37, "Order."

3 2. On September 6, 2024, Plaintiff filed a motion for reconsideration of the Order. Dkt.
4 38. Equifax responded to the motion for reconsideration on September 20, 2024. Dkt. 39.

5 3. On September 24, 2024, the Magistrate Judge denied the motion for reconsideration.
6 Dkt. 40.

7 4. On October 7, 2024, Plaintiff filed her Objections. Dkt. 41.

8 5. Pursuant to LR IB 3-1(a), Equifax's responses to the Objections are due on October
9 21, 2024.

10 6. On October 8, 2024, counsel for Equifax contacted counsel for Plaintiff to request
11 an additional two weeks to submit its response to Plaintiff's Objections. The request was made to
12 allow Equifax additional time to prepare an appropriate response to the arguments raised in the
13 Objections and to accommodate Equifax's counsel's other professional commitments, including
14 time-sensitive briefing in other matters. Plaintiff's counsel indicated that she does not oppose
15 Equifax's request. Plaintiff further requested that she be given two additional weeks to move for
16 leave to submit a reply. Equifax does not oppose Plaintiff's request for additional time to move for
17 leave to submit a reply.¹

18 7. Equifax further states that these circumstances present an "unforeseen
19 circumstance" that merits an extension as described in the Court's previous May 24, 2024 Order.
20 See Dkt. 27. Equifax did not anticipate that Plaintiff would object to the Order staying discovery
21 after the Court denied Plaintiff's motion for reconsideration.

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27 ¹ Pursuant to LR IB 3-1(a), Plaintiff may file a reply "only with leave of the court." While Equifax
28 does not oppose Plaintiff's request for additional time to move for leave to file a reply, it expressly
reserves its right to challenge Plaintiff's ability to file a reply.

1 8. Accordingly, all parties hereby stipulate, subject to the Court's approval, that
2 Equifax's response to Plaintiff's Objections is due by November 4, 2024 and that Plaintiff be given
3 two additional weeks to move for leave to submit a reply. This is the third stipulation for extension
4 of time Equifax has requested in this case and the first stipulation for extension of time Equifax has
5 requested as to its response to Plaintiff's Objections. This stipulation is filed in good faith and not
6 intended to cause delay.
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1 **WHEREFORE**, Defendant Equifax Information Services LLC respectfully requests that
2 the Court grant this Stipulation and thereby extend its time to file its response to Plaintiff's
3 Objections to November 4, 2024 and that Plaintiff be given two additional weeks to move for leave
4 to file a reply.

5 Respectfully submitted on October 14, 2024.

6 CLARK HILL PLLC

7 By: /s/ Gia N. Marina

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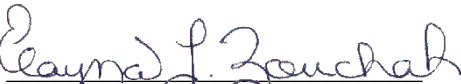
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19 Attorneys for Defendant Equifax Information
20 Services LLC

21 **ORDER**

22 IT IS SO ORDERED on this 15th day of
23 October, 2024.

24 

25 U.S. MAGISTRATE JUDGE
26 ELAYNA J. YOUCHAH

BOIES SCHILLER FLEXNER LLP

By: /s/ Georgie F. Carpinello

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